

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

<b>IN RE: NATIONAL PRESCRIPTION</b>	)	<b>MDL No. 2804</b>
<b>OPIATE LITIGATION</b>	)	
	)	<b>Case No. 1:17-md-2804</b>
<b>THIS DOCUMENT RELATES TO:</b>	)	
	)	<b>Judge Dan Aaron Polster</b>
<b>ALL CASES</b>	)	
	)	<b>Mag. Judge David A. Ruiz</b>
	)	
	)	
	)	

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**PLAINTIFF CITY OF CLEVELAND’S MOTION FOR LEAVE TO FILE UNDER SEAL  
THE REPLY TO ENDO DEFENDANTS’ BRIEF IN OPPOSITION TO THE MOTION  
TO DISQUALIFY CAROLE RENDON**

Pursuant to Local Rule 5.2, Plaintiff City of Cleveland seeks leave of Court to file its Reply to Endo Defendants’ Brief in Opposition to the Motion to Disqualify Carole Rendon and accompanying documents in the above-listed case under seal. Plaintiff files this Motion and Proposed Order to ensure compliance with CMO No. 2: Protective Order (ECF Doc. 441) and the Protective Order Re: DEA’s ARCOS/DADS Database (ECF Doc. 167). Plaintiff respectfully requests the option to proceed in this manner so there are no inadvertent disclosures of confidential information subject to CMO No. 2 or the ARCOS Protective Order.

WHEREFORE, Plaintiff respectfully requests the Honorable Court to grant Plaintiff’s Motion for Leave to File Reply to Endo Defendants’ Brief in Opposition to the Motion for Leave to Disqualify Carole Rendon Under Seal.

Dated: January 29, 2019

RESPECTFULLY SUBMITTED:

/s/Mark Pifko

Mark Pifko

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on January 29, 2019, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF System. Copies will be served upon counsel of record by, and may be obtained through, the Court CM/ECF Systems.

/s/Mark Pifko

Mark Pifko

*Counsel for Plaintiff the City of Cleveland*